

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC,

Plaintiffs,

V.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

DECLARATION OF SARAH BEIGBEDER PETTY

I, Sarah Beigbeder Petty, declare as follows:

1. I am a counsel at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts, 02109. I am one of the attorneys responsible for the representation of Defendant Ford Motor Company (“Ford”) in the above-captioned matter.

2. Attached to this declaration as ***Exhibit 1*** is a true and correct copy of an excerpt from Ford's 2012 Annual Report, accessed from <http://corporate.ford.com/annual-report-2012/message-to-the-stockholders-executive-team.html> on February 28, 2014.

3. Attached to this declaration as ***Exhibit 2*** is a true and correct copy of an email sent from Genevieve Vose Wallace, counsel for Plaintiffs, to counsel for Ford on February 17, 2014.

4. Attached to this declaration as ***Exhibit 3*** is a true and correct copy of “Q&A With Doug VanDagens,” dated Oct. 28, 2009, 11:19 PM ET, accessed from <http://www.at.ford.com/news/cn/ArticleArchives/QAwit...> on January 27, 2014.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 28th day of February, 2014.

/s/ Sarah Beigbeder Petty
Sarah Beigbeder Petty

1 **CERTIFICATE OF SERVICE**

2 I certify that a copy of the foregoing document was filed electronically with the Court
3 and thus served simultaneously upon all counsel of record, this 28th day of February, 2014.

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5 _____
6 /s/ *Duncan E. Manville*
Duncan E. Manville

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